

Reject Disposal Injection Well Permit PAS2D702BALL

Non-responsive based on revised scope.

Mon 8/29/2022 12:33 AM

To: R3 UIC Mailbo R3 UIC Mailbo @epa.gov

Please deny the proposed permit PAS2D702BALL for the conversion and operation of a UIC Class IID commercial disposal injection well, Sedat #4A, located in Plum Borough, Allegheny County, Pennsylvania. The applicant, Penneco Environmental Solutions, LLC, has several violations and an unresolved permit application at immediately adjacent injection wells, directly related to the current permit application.

During the last known file review of the Sedat #3A injection well conducted by the Pennsylvania Department of Environmental Protection (DEP) on July 22, 2021, it was found that the "Well operator failed to notify the Department within 24 hours of receiving notification from a landowner, water purveyor, or affected person **that a water supply has been affected by pollution or diminution.**" Since that file review, there have been no subsequent file review or inspection at this site. DEP is clearly not equipped to adequately monitor the conditions of disposal injection wells.

Additionally, immediately after receiving a disposal injection well permit from EPA and DEP, **DEP issued five violations to Penneco Environmental Solutions** for poor construction practices at the Sedat #3A well on August 12, 2020 that could easily contribute to the failure of the well to contain contaminant.

Both sets of violations can be found here:

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3224342

https://www.ahs.dep.pa.gov/eFACTSWeb/searchResults_singleViol.aspx?InspectionID=3067473

Given the above violation, Penneco Environmental Solutions has not met the condition of its existing disposal injection well permit for Sedat #3A and should therefore not be granted an additional permit for another disposal injection well permit at the same location, designated as Sedat #4A.

Additionally, DEP's sporadic and infrequent inspection schedule indicates that DEP clearly does not have the resources to ensure that Penneco's injection disposal well and monitoring well at this site are properly functioning. I urge the EPA to deny this permit application.

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